

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO ALL
ACTIONS

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

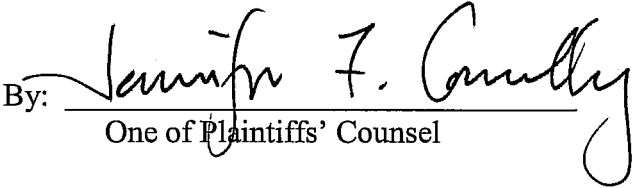
**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL THE SUPPLEMENTATION OF
ASTRAZENECA'S PRIVILEGE LOGS OR, IN THE ALTERNATIVE, TO COMPEL
THE PRODUCTION OF INADEQUATELY DESCRIBED DOCUMENTS**

Plaintiffs, by their attorneys, respectfully move this Court for leave to file a reply brief in support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs, Or, In The Alternative, To Compel the Production of Inadequately Described Documents ("Motion to Compel").

1. Local Rule 7.1(b)(2) requires that additional papers, "whether in the form of a reply or otherwise, may be submitted only with leave of Court."
2. In its opposition to plaintiffs' Motion to Compel AstraZeneca makes various arguments about, among others, the accuracy of the appendices attached to plaintiffs' Motion to Compel. These arguments merit the filing of a reply brief.
3. Neither this Court nor any party will be prejudiced by the filing of this reply brief. Plaintiffs anticipate that their reply will be short and request only until July 15, 2005 to file it.
4. Plaintiffs attempted to confer with AstraZeneca before the filing of this motion; however, AstraZeneca did not respond to indicate whether it would oppose the relief requested herein.

WHEREFORE plaintiffs respectfully request that this Court grant them leave to file a reply brief in support of their Motion to Compel, and all other relief that this Court deems just and proper.

Dated: August 9, 2005

By: 
One of Plaintiffs' Counsel

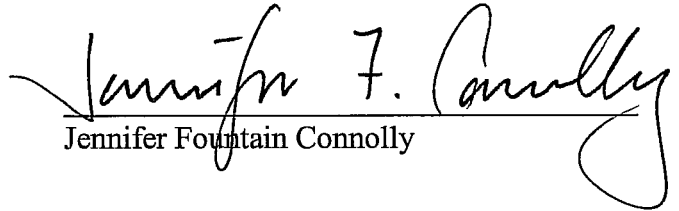
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CERTIFICATE OF SERVICE BY VERILAW

Docket No. MDL 1456

I, Jennifer Fountain Connolly, hereby certify that I am one of plaintiffs' attorneys and that, on August 9, 2005, I caused copies of ***Plaintiffs' Motion for Leave to File Reply Brief in Support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs or, in the Alternative, to Compel the Production of Inadequately Described Documents*** to be served on all counsel of record by causing same to be posted electronically via Verilaw.


Jennifer Fountain Connolly